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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN DUANE KEELS,

Defendant.

Case:2:23-cr-20085

Judge: Lawson, David M.

MJ: Stafford, Elizabeth A.

Filed: 02-09-2023 At 03:20 PM

INDI USA v. Keels(jo)

Violation(s):

18 U.S.C. § 922(g)(1)

21 U.S.C. § 841(a)(1)

18 U.S.C. § 924(c)

F I L E D  
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**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

**(18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)**

On or about January 30, 2023, in the Eastern District of Michigan, Southern Division, the defendant, STEPHEN KEELS, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, firearms, that is: one Taurus Model G2c, 9mm caliber pistol and one Mossberg .22 caliber AR-15, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO**  
**(21 U.S.C. § 841(a)(1) – Possession with Intent  
to Distribute Cocaine Base)**

On or about January 30, 2023, in the Eastern District of Michigan, Southern Division, the defendant, STEPHEN KEELS, knowingly and intentionally possessed with intent to distribute a controlled substance, specifically, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**  
**(18 U.S.C. § 924(c) – Possession of a Firearm  
in Furtherance of a Drug-Trafficking Crime)**

On or about January 30, 2023, in the Eastern District of Michigan, Southern Division, the defendant, STEPHEN KEELS, knowingly possessed firearms, namely: one Taurus Model G2c, 9mm caliber pistol and one Mossberg .22 caliber AR-15, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute controlled substance, as charged in Count One of the Indictment, in violation of Title 18, United States Code, Section 924(c).

**FORFEITURE ALLEGATIONS**

**(Criminal Forfeiture – 21 U.S.C. § 853; 18 U.S.C. § 924(d); 28 U.S.C. § 2461)**

1. The allegations contained in Counts One through Three of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853, and Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461.

2. Upon conviction of the offense alleged in Count One of this Indictment and/or the offense alleged in Count Three of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c), any firearm(s) and ammunition involved in or used in the knowing commission of the offense(s), including, but not limited to, the following:

- a. One Taurus Model G2c, 9mm caliber pistol;
- b. One Mossberg .22 caliber AR-15; and
- c. Assorted ammunition.

3. Upon conviction of the offense alleged in Count Two of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

4. Substitute Assets: If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson  
Grand Jury Foreperson

DAWN N. ISON  
United States Attorney

s/ Brandy R. McMillion  
BRANDY R. McMILLION  
Chief, General Crimes Unit  
Assistant United States Attorney

s/ Jasmine Ayana Moore  
JASMINE AYANA MOORE  
Assistant United States Attorney

Date: February 9, 2023

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	<b>Case Number</b> Case:2:23-cr-20085 Judge: Lawson, David M. MJ: Stafford, Elizabeth A. Filed: 02-09-2023 At 03:20 PM INDI USA v. Keels(jo)
NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete the following information:		
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :		<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<b>AUSA's Initials:</b> <i>jm</i>

Case Title: USA v. Stephen Duane KeelsCounty where offense occurred : OaklandCheck One:    ☒ Felony                      ☐ Misdemeanor                      ☐ Petty☐ Indictment/ ☐ Information --- no prior complaint.☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 23-mj-30039]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

February 9, 2023  
 Date

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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.